

**RADICE LAW FIRM**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

TAYLOR GOINES, Individually and on  
Behalf of Itself and All Others Similarly  
Situating,

Plaintiff,

v.

CELSIUS NETWORK, LLC, CELSIUS  
LENDING, LLC, CELSIUS KEYFI LLC,  
ALEXANDER MASHINSKY, SHLOMI  
“DANIEL” LEON, DAVID BARSE, and  
ALAN JEFFREY CARR,

Defendants.

Case No. 2:22-cv-04560

**NOTICE OF MOTION AND MOTION OF THE CELSIUS INVESTOR MOVANTS FOR  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF COUNSEL**

PLEASE TAKE NOTICE that on October 17, 2022, or such other date and time as the Court may set Movants Zack Kaplan, Eli Kaplan, Ben Kaplan, Michael Kaplan, and Michael Mazzotta (“Celsius Investor Movants”), by their counsel, will move this Court for an Order in the form submitted herewith: (i) appointing Celsius Investor Movants as Lead Plaintiff; (ii) approving Celsius Investor Movants’ selection of Scott+Scott Attorneys at Law LLP (“Scott+Scott”) to serve as Lead Counsel and Radice Law Firm (“Radice”) to serve as Liaison Counsel; (iii) appointing Scott+Scott and Radice as Lead and Liaison Counsel, respectively, over the non-securities claims alleged in the complaint; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Celsius Investor Movants submit herewith a Memorandum of Law and the Declaration of John Radice, dated September 13, 2022.

Dated: September 13, 2022

Respectfully submitted,

**RADICE LAW FIRM**

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*Attorneys for Plaintiff and the Proposed Lead  
Counsel*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 13, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: September 13, 2022

*s/ John Radice*  
JOHN RADICE (Bar No. 023612004)